



THOMAS FARM AND RANCH
JEFFERY J THOMAS OWNER
2705 WEST 2000 NORTH
MALAD CITY, ID 83252

MAY 18, 2005

NATIONAL ORGANIC STANDARDS BOARD
C/O ARTHUR NEAL
ROOM 4008 - SOUTH BUILDING
1400 AND INDEPENDENCE AVENUE SW
WASHINGTON, DC 20250-001

DEAR MR. NEAL:

I AM WRITING TO VOICE MY OPINION AGAINST PORTIONS OF THE NOSB GUIDANCE FOR INTERPRETATION OF SECTION 205.239(a)(2) OF THE NATIONAL ORGANIC PROGRAM, PUBLISHED ON MARCH 22ND.

AS A FARMER, I AM CONCERNED ABOUT RESTRICTIONS AND HOW THEY WILL FINANCIALLY IMPACT GROWTH OF ORGANIC DAIRIES IN MY AREA. WE CANNOT AFFORD TO HURT THEM OR EVEN FORCE THEM TO SHUT DOWN. THE SECTIONS A AND C COULD SLOW THE GROW OF ORGANIC DAIRY FARMS IN MY AREA. I FEEL THIS COULD HURT MY ABILITY TO SELL HIGH QUALITY HAY TO THE DAIRY. I FEEL WE HAVE TO WORK TOGETHER TO HELP ENCOURAGE GROWTH FOR THE FARMERS, BOTH PRODUCERS AND THE ECONOMY. IF WE DON'T HELP THE FARMERS, THIS COUNTRY IS THEN DEPENDENT UPON IMPORTS AND WE ALL KNOW WHAT THE PRICE OF FUEL IS.

IN SECTION A, I DISAGREE WITH A COUPLE OF PARTS IN THE WORDING.

1. SPECIFIC NUMERICAL REQUIREMENT FOR 30% DRY MATTER INTAKE ON A DAILY BASIS DURING THE GROWING SEASON BUT NOT LESS THAN 120 DAYS.

MY FARM GROWS CERTIFIED SPRING WHEAT, ALFALFA HAY, BARLEY, OATS. WE FARM IN TWO DIFFERENT COUNTIES OF IDAHO AND THE DIFFERENT IN SOILS VARY WITH CLIMATE AND ELEVATION AND WATER. WHAT WORKS ON ONE FIELD MAY NOT WORK ON ALL. THEREFORE TO DICTATE THEY ALL WILL PERFORM ALIKE DOES NOT WORK. EACH ORGANIC PLAN IS DIFFERENT TO BEST FIT THAT FARM AND OPERATION. I FEEL EACH FARMER HAS THE RIGHT TO DEVELOP HIS OWN PLAN AND ABIDE BY THE ORGANIC STANDARD THAT HAVE BEEN SET.

2. THE FIVE REPORTING REQUIREMENTS

EACH ORGANIC FARMER IS ALREADY REPORTING MANAGEMENT PRACTICES AND VERIFICATION OF ALL INPUT AND TO ADD ADDITION REPORTING IS NOT BENEFICIAL TO ANY ONE, NOR IS IT COST EFFECTIVE.

3. SECTION (C)

I DISAGREE WITH USING NRCS ON THE COUNTY BASIS TO REGULATE DAIRY GRAZING. THIS PRACTICE IS GEARED FOR THE COW-CALF OPERATOR THAT USES GRAZING ON THE RANGE FOR MONTHS AT A TIME, NOT DAIRY PASTURE COWS WHO TRAVEL TO THE BARN DAILY AND BACK TO GRAZE.

SECTION (B)

THIS SEEMS TO BE all right, SINCE DAIRY ANIMALS SHOULD BE OUTSIDE AS MUCH AS POSSIBLE WITH ACCESS TO PASTURE.

I APPRECIATE YOUR TIME AND CONSIDERATION IN THESE MATTERS THAT AFFECT
THE FINANCIAL STRENGTH OF THE U S FARMER AND BELIEVE IN THE BENEFIT OF THE ORGANIC
PROGRAM.

SINCERELY,

A handwritten signature in black ink, appearing to read "Jeffery J Thomas". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

JEFFERY J THOMAS
THOMAS FARM AND RANCH